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REMARKS

Claims 1-45 are currently pending in the present application and are presently under consideration. Claims 5, 7, 9 and 10 have been amended herein to remedy minor informalities, and are for clarification purposes only, and such amendments do not narrow the scope of these respective claims. A clean version of all pending claims is found at pages 2-12. Favorable reconsideration is requested in view of the comments and amendments herein.

I. Rejection of Claims 5, 7, and 9-11 under 35 U.S.C. §112

Claims 5, 7, and 9-11 stand rejected under 35 U.S.C. §112 as being indefinite for failing to particularly point out and distinctly claim the subject matter regarded as the invention. Claims 5, 7, 9, and 10 have been amended herein to cure these informalities, and withdrawal of this rejection is respectfully requested.

II. Rejection of Claims 16, 23, 30, 32-35, 37, 38, 41, 42, 43, and 45 under 35 U.S.C. §102(b)

Claims 16, 23, 30, 32-35, 37, 38, 41, 42, 43, and 45 stand rejected under 35 U.S.C. §102(b) as being anticipated by Oppenheim (US 5,734,905). Reconsideration and allowance of these is respectfully requested for at least the following reasons. Oppenheim does not teach or suggest each and every feature of applicants' invention as recited in the subject claims.

For a prior art reference to anticipate, 35 U.S.C. §102 requires that "each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (quoting *Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)).

Regarding independent claims 16, 32, and 42, Oppenheim does not disclose a *function object...for performing a function... and creating a mapping...to perform the function according to a source object node... and to provide an output value associated*

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with a target object node according to the function as recited in these claims. The present invention facilitates constructing a mapping between two disparate object types without requiring an ordinary user to have extensive knowledge in computer programming. The claimed *function object* facilitates creation of a mapping between two such object types by graphically associating a source object node to a target object node *via* a graphical component of the *function object*.

In contrast to the subject invention, transformation of objects as disclosed in Oppenheim does not utilize a *function object* to create a mapping between disparate object types. Rather, Oppenheim teaches facilitating *communication* between two objects, wherein one object can be transformed into another object if a mapping between the two objects has been scripted *prior* to a user requesting such transformation (*e.g.*, two disparate objects communicate with one another to determine if a mapping between such two objects presently exists). For example, in an instance that a user desires transformation of a document of type A into a document of type B using the Oppenheim invention, computer code for a mapping between document A and document B must be written and compiled *prior* to the request of transformation by the user (*See* Col. 5, lines 38-44, requiring a set of transformation scripts). Oppenheim teaches that an error message occurs when transformation scripts are unavailable between selected objects (*See* col. 5, lines 45-50). As a mapping between objects has already been created, there is no need to employ a *function object* that facilitates creation of a mapping between disparate object types as in the claimed invention.

The present invention facilitates creation of a mapping between a source object and a target object, wherein a *node* of the source object can be associated with a *node* of the target object *via* the *function object* - *nodes* are components defining objects (*e.g.*, several nodes exist in objects). Therefore, a particular mapping between two disparate objects can be created by a computer user not an expert in computer programming. In contrast, the invention disclosed in Oppenheim facilitates transfer of data between two or more applications, wherein the first application has a data output port and the second application has a data input port. If a mapping between two applications has been *previously scripted*, data output from the first application can be delivered to the input port of the second application. The process can then be repeated to direct data through

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several applications, wherein mapping between each pair of applications has been *previously scripted*. Oppenheim teaches associating three applications, wherein a first mapping *previously scripted* facilitates transfer of data from the first and second applications, and a second mapping *previously scripted* facilitates transfer of data between the second and third applications. See Fig. 8 and discussion related thereto. The second application does not become a *function object* utilized to generate a particular mapping between the first and third application as recited in applicants' claimed invention. Rather, the second application operates without regard to the first and third applications (e.g., the second application acts on data delivered from the first application as it would to any input data). Therefore, Oppenheim does not disclose or suggest a *function object* utilized to associate a target object with a source object as recited in the subject claims.

Regarding independent claims 33 and 41, as Oppenheim does not disclose a function object, Oppenheim cannot disclose a system and method for creating a function object as required by these claims. Further regarding these claims, as well as independent claims 16, 32, 33, 42, 43 and 45, Oppenheim does not teach *creating a script component for performing a function*. Oppenheim discloses utilizing "transformation scripts" for transforming one object into another object (See col. 5 lines 38-41 and Fig. 2). Such "transformation scripts" do not perform a function as recited in applicants' claims; but rather are an entire mapping between two object types. In contrast, the script component of applicants' claimed invention facilitates creating a user-specified mapping between two disparate objects.

In view of at least the above, it is readily apparent that Oppenheim neither anticipates nor makes obvious the subject invention as recited in independent claims 16, 32, 33, 41, 42, 43, and 45 (and claims 23, 30, 34, 35, 37, and 38 which depend there from). This rejection should be withdrawn.

III. Rejection of Claims 1-15, 17-22, 24-27, and 44 under 35 U.S.C. §103(a)

Claims 1-15, 17-22, 24-27, and 44 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Oppenheim and Microsoft's "Component Object Model Specification" (COM Specification). It is respectfully submitted that this rejection should

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be withdrawn for at least the following reasons. Neither Oppenheim nor Microsoft's COM specification alone or in combination teach or suggest all the claim limitations of the subject invention.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP §706.02(j).

Independent claims 1 and 44 recites features similar to that discussed above with respect to independent claim 16. As discussed *supra*, Oppenheim does not teach or suggest a *function object* utilized to facilitate creation of a mapping between two objects, let alone particular components of the *function object* as recited in these independent claims. Microsoft's COM specification fails to make up for these deficiencies of Oppenheim *vis a vis* applicants' invention as recited in independent claims 1, 16 and 44 (and claims 2-15, 17-22, and 24-27, which respectively depend there from).

This rejection should be withdrawn.

IV. Rejection of Claims 28, 29, and 31 under 35 U.S.C. §103(a)

Claims 28, 29, and 31 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Oppenheim in view of Jordan (US 5,778,227). Reconsideration and allowance of these claims is respectfully requested for at least the following reasons. The subject claims depend from independent claim 16, and Jordan does not make up for the aforementioned deficiencies of Oppenheim regarding claim 16. Therefore, this rejection should be withdrawn.

09/662,399MS147164.1**V. Rejection of Claims 36, 39, and 40 under 35 U.S.C. §103(a)**

Claims 36, 39, and 40 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Oppenheim, in view of Faustini (US 6,496,870). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons.

Faustini does not make up for the aforementioned deficiencies of Oppenheim regarding independent claim 33 from which claims 36, 39 and 40 respectively depend, and therefore this rejection should be withdrawn.

VI. Conclusion

The present application is believed to be condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

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